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— ADVOCATES —

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May 24, 2022

Via ECF

Honorable Mary Kay Vyskocil
Southern District of New York
500 Pearl Street, Room 2230
New York, NY 10007

VyskocilNYSDChambers@nysd.uscourts

RE: *Clifford, et al. v. Janklow, et al.*
Case No. 1:22-cv-01259-MKV

Dear Judge Vyskocil:

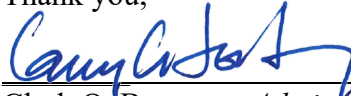
This firm represents the Plaintiffs in the above captioned matter. On May 20, 2022, Defendants filed a Motion to Dismiss (35 pages) attaching 18 exhibits which total 1,257 pages, 1,115 of which are argument, testimony, bench conferences and jury instructions from the criminal trial of *USA v. Michael Avenatti*, SDNY, 19-cr-374-JMF.

Plaintiffs' response under Local Rule 6.1 is due on June 3, 2022. Given the volume of matters outside the pleadings attached to the Motion to Dismiss, Plaintiffs request an additional 10 days in which to file their Response Brief, or on June 13, 2022.

Counsel for Defendants has been contacted and does not oppose the requested extension but only that Defendants be granted the same 10-day extension to file the Reply Brief.

Plaintiffs request that the court grant them an extension of 10 days to file the Response Brief or until June 13, 2022 and similarly, Defendants be granted an additional 10 days to file the Reply Brief or until June 30, 2022. Defendants also request that the papers be filed by 4:00 pm eastern on the respective due dates, to which Plaintiffs do not object.

Thank you,



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